

1 Q. And also from the back, correct?

2 A. Yes, both accessible.

3 Q. Both accessible. Now, in 2019, was there
4 also a very clear area in front of that same racking
5 system to allow it to be loaded from the front?

6 A. Yes.

7 Q. And the batteries appeared to be placed on
8 the very bottom shelf and the second shelf up; is that
9 correct?

10 A. Yes.

11 Q. And is that the same location that they were
12 in in 2019?

13 A. They would have been.

14 Q. Okay. So you didn't use the top shelves or
15 anything like that in 2019 for the heavy batteries,
16 right?

17 A. For other inventory, not for batteries.

18 Q. Okay. So, again, I just want to make sure
19 that what we saw today is representative of where they
20 were located physically on the rack in 2019 as well.

21 A. Yes.

22 Q. And they were; is that right?

23 A. Yes.

24 Q. Okay. So in terms of the locations of the
25 batteries on the rack, when I was -- we were there

1 today, we noticed that there were the larger batteries
2 on the very bottom shelf and then there were some
3 smaller sized batteries on the second shelf up; is that
4 correct?

5 A. Correct.

6 Q. And was that the case also in 2019?

7 A. Should have been, yes.

8 Q. Okay. And you were there every day. Is that
9 what you recall?

10 A. (Nodding head.)

11 Q. Is that a yes, sir?

12 A. I'm sorry. Yes. Every day is a lot of days.

13 Q. It is. I understand that. And the only
14 reason I asked you is because a head nod doesn't pick up
15 well on a transcript.

16 A. Understood.

17 Q. Okay. So on the very bottom shelf today of
18 the -- there were two larger batteries that were there,
19 two of the very largest batteries -- I don't know the
20 technical name for them, but they're very large
21 batteries, maybe 50 pounds or more. How many of those
22 batteries does Atlantic Coast ToyotaLift keep in stock
23 at any one time?

24 A. Minimally, a couple of each group size. And
25 I'm not sure that we had that size battery in 2019

1 because those batteries go with a product line that we
2 have just begun to take on, Hitachi, and particularly
3 Doosan. So I couldn't speak to 2019 the number of those
4 group size batteries that we would have inventoried.

5 Q. Okay. In terms of the rack, there is a
6 slight slope from back to front on each of those two
7 shelves, correct?

8 A. Correct.

9 Q. When you push a battery back to rotate them
10 in the stock, do they come sliding back down forward on
11 their own or do you have to manually pull them back down
12 because there's enough static friction to hold them in
13 place?

14 A. They will slide forward, but I would not
15 say -- it's not like on rollers, but they can be moved
16 relatively easy on the rack.

17 Q. And does that go for the second shelf as well
18 as the bottom shelf?

19 A. Yes. The heavier batteries being on the
20 bottom shelf would take more effort.

21 Q. Gotcha, okay. But they were able to be moved
22 around on the shelves with relative ease; is that a fair
23 statement in your assessment?

24 A. Yes.

25 Q. Okay. Was that the case in your